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Attorneys for Defendants  
 SERGEANT CONROY TAM (# 138),  
 OFFICER JARED HARRIS (# 1065), and  
 OFFICER BRIAN HICKLIN (# 1151)

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA

WILLIE M. FLANIGAN,

Plaintiff,

vs.

SAN FRANCISCO POLICE DEPARTMENT,  
 et al.,

Defendants.

Case No. 3:16-cv-00066 WHA (PR)

**DEFENDANTS' PROPOSED WITNESS LIST**

Trial Date: June 5, 2023

Defendants SERGEANT CONROY TAM, OFFICER JARED HARRIS, and OFFICER BRIAN HICKLIN (collectively, "Defendants") submit the following list of witnesses who may be called by Defendants to testify at trial:

No.	Name	Expected Testimony
1.	Plaintiff Willie M. Flanigan	Party

No.	Name	Expected Testimony
2.	Anthony Holder (#1873)	Traffic collision investigation on 10/31/14; Facts regarding arrest and use of force
3.	Shaughn Ryan (#1756)	Traffic collision investigation on 10/31/14; Facts regarding arrest and use of force
4.	Defendant Jared Harris (#1065)	Party
5.	Defendant Conroy Tam (#138)	Party
6.	Defendant Brian Hicklin (#1151)	Party
7.	Officer Timothy Paine (#763)	Traffic collision investigation on 10/31/14; Facts regarding arrest and use of force
8.	Officer Wesley Villaruel (#1939)	Facts regarding collision investigations at Geary and Webster Street and Geary and Steiner Street, San Francisco; statements given on scene by plaintiff, Quayle, Lampkin, Ofc. Harris, Cooper, Hudson, Sgt. Tam, Ofc. Hicklin; observance of vehicle damage and points of rest; observance of accident scene conditions; stolen status of vehicle that plaintiff was operating.
9.	Officer Steven Landi (#937)	Facts regarding observation, interview, plaintiff admissions, and blood drawing of plaintiff at San Francisco General Hospital on 10/31/14. Chain of custody regarding blood samples. DRE (Drug Recognition Expert) training and qualifications.
10.	Sergeant Frank Harrell (#918)	Observations regarding accident on 10/31/14 involving plaintiff
11.	Officer Angel Lozano (#554)	Observations regarding accident on 10/31/14 involving plaintiff
12.	Officer Michael White (#1639)	Observations regarding accident on 10/31/14 involving plaintiff
13.	Officer James Arnswald (#791)	Investigation of pedestrian/vehicle accident between plaintiff and Sergeant Holder on 10/31/14 at Turk Street.
14.	Officer Lawrence Henderson (#1420)	Investigation of hit and run vehicle accident by plaintiff on 10/31/14 at Geary and Webster Street.
15.	Officer Pearl Rogers (#591)	Investigation of vehicle accidents by plaintiff on 10/31/14.
16.	Officer Aaron Bjorkquist (#563)	Investigation of vehicle accidents by plaintiff on 10/31/14.
17.	Officer Enea	Facts regarding observation, interview,

No.	Name	Expected Testimony
		plaintiff admissions, and blood drawing of plaintiff at San Francisco General Hospital on 10/31/14. Chain of custody regarding blood samples.
18.	Peter Cameron Quayle	Facts regarding traffic collision on Geary and Steiner on 10/31/14
19.	Charlotte Velasquez	Blood draw of plaintiff at San Francisco General Hospital on 10/31/14.
20.	Officer Schimek (#34)	Facts regarding confirmation that the license plate on the vehicle that plaintiff was operating was stolen
21.	Officer Gonzalez (#2264)	Facts regarding plaintiff while he was watched at San Francisco General Hospital
22.	Sergeant Mahoney (#578)	Officers responding to the accidents on 10/31/14 involving plaintiff
25.	Pavlos Karamanidis, B.S.	Facts regarding performance and results of the Report of Forensic Toxicology Analysis of specimen taken on 10/31/14.
23.	Luke Rodda, PhD	Facts regarding performance and results of the Report of Forensic Toxicology Analysis of specimen taken on 10/31/14.
24.	Armida Adams, RN	Triage nurse at San Francisco General Hospital; facts regarding plaintiff's presentations, statements regarding his condition, observations of his conditions; treatment provided; lack of cooperation by plaintiff
25.	Robert Spencer, MD	Facts regarding plaintiff's subjective complaints; physical examination; diagnoses; radiological scans; treatment administered; plaintiff's statements and lack of cooperation.
26.	Mark N. Pederson, MD	Facts regarding plaintiff's subjective complaints; physical examination; diagnoses; radiological scans; treatment administered; plaintiff's statements and lack of cooperation.
27.	Christa Gallagher	Treatment provided at County Jail, plaintiff's complaints, statements, injuries or lack thereof.
28.	Ian Albert	Mental health treatment and observation at County Jail, statements, injuries, or lack thereof
29.	Monica Soto	Mental health treatment and observation at County Jail, statements, injuries, or lack thereof

No.	Name	Expected Testimony
31.	Mark Leary	Mental health treatment and observation at County Jail, statements, injuries, or lack thereof
32.	David Hudson	Facts regarding the car Plaintiff was driving; its stolen status (2012 Toyota Highlander)
33.	Ram Nilesh, Eddie Tsui, or other person most knowledgeable regarding traffic signal function	Traffic signal function
34.	Matthew Harger	Facts and circumstances related to Plaintiff's May 8, 2007 arrest
35.	Roderick Suguitan	Facts and circumstances related to Plaintiff's August 27, 2013 arrest
36.	Jarron Cross	Facts and circumstances related to Plaintiff's August 27, 2013 arrest
37.	Saqib Aslam	Facts and circumstances related to Plaintiff's August 27, 2013 arrest
38.	Carmen Walsh	Facts and circumstances related to Plaintiff's August 27, 2013 arrest
39.	Brien Hoo	Facts and circumstances related to Plaintiff's August 27, 2013 arrest
40.	John Barcojo	Facts and circumstances related to Plaintiff's August 27, 2013 arrest
41.	Kevin Chin	Facts and circumstances related to Plaintiff's August 27, 2013 arrest
42.	Aaron Lozada	Facts and circumstances related to Plaintiff's August 27, 2013 arrest
43.	Kyle Jakobsen	Facts and circumstances related to Plaintiff's July 3, 2015 arrest
44.	Bandy Riley	Facts and circumstances related to Plaintiff's October 10, 2016 arrest
45.	Joseph Majeski	Facts and circumstances related to Plaintiff's October 10, 2016 arrest
46.	Timothy Brophy	Facts and circumstances related to Plaintiff's September 11, 2017 arrest
47.	Steven Orengo	Facts and circumstances related to Plaintiff's September 11, 2017 arrest
48.	Ryan McEachern	Facts and circumstances related to Plaintiff's October 18, 2017 arrest
49.	Christopher Wilhelm	Facts and circumstances related to Plaintiff's October 18, 2017 arrest
50.	John Conway	Facts and circumstances related to Plaintiff's October 18, 2017 arrest
51.	Danielle Drago	Facts and circumstances related to Plaintiff's October 18, 2017 arrest
52.	Dylan Baldwin	Facts and circumstances related to Plaintiff's October 18, 2017 arrest

No.	Name	Expected Testimony
53.	David Vizcay	Facts and circumstances related to Plaintiff's October 18, 2017 arrest
54.	Brian Guiney	Facts and circumstances related to Plaintiff's October 18, 2017 arrest
55.	Matthew Sullivan	Facts and circumstances related to Plaintiff's October 18, 2017 arrest
56.	Custodian of Records at San Mateo Jail	Authentication of records
57.	Custodian of Records at Santa Clara Jail	Authentication of records
58.	Custodian of Records at California Department of Corrections and Rehabilitation	Authentication of Records
59.	Custodian of Records of San Francisco Fire Department	Authentication of records.
60.	Custodian of Records of San Mateo Medical Center	Authentication of records.
61.	Custodian of Records of San Francisco General Hospital	Authentication of records.
62.	Custodian of Records of Plaintiff's Medical Providers	Authentication of records.
63.	Custodian of Records of Department of Emergency Management	Authentication of DEM recordings and records.
64.	San Francisco Police Department Custodian of Records.	Authentication of SFPD records.
65.	San Francisco Sheriff's Department Custodian of Records	Authentication of SFSD records.
66.	California Highway Patrol Custodian of records	Authentication of CHP documents
67.	Custodian of Records for San Francisco Medical Examiner's Office	Authentication of the Report of Forensic Toxicology Analysis of specimen taken on 10/31/14.
68.	Custodian of Records of San Quentin	Authentication of records
69.	Brian Doherty, PhD	Opinions described in expert disclosure
70.	Darrell Hayes, MD	Opinions described in expert disclosure
71.	Jeffrey Martin	Opinions described in expert disclosure
72.	John Mendelson, MD	Opinions described in expert disclosure
73.	Tadao Yamaguchi	Opinions described in expert disclosure

1 Dated: March 8, 2023

2 DAVID CHIU  
3 City Attorney  
4 MEREDITH B. OSBORN  
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8 By: /s/ Sabrina M. Berdux  
9 SABRINA M. BERDUX

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